Central Basin
Municipal Water District

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November 22, 2010

Ms. Lynda Deschambault
Remedial Project Manager
U.S. EPA Region 9
75 Hawthorne Street (SFD-7-1)
San Francisco, CA 94105

**RE: Proposed Plan for Omega Chemical Corporation Superfund Site**

Dear Ms. Deschambault:

Central Basin Municipal Water District (Central Basin) has reviewed your "Omega Chemical Corporation Superfund Site" proposed plan from August 2010, which includes six proposed remediation alternatives, and we have several serious concerns about the conclusions presented. However, before we provide you with our comments on the alternatives, we would like to make you aware of Central Basin's position as a significant entity and interested party in the region regarding this situation.

**Central Basin Municipal Water District Realities**

The U.S. EPA (EPA) should be aware that Central Basin is the wholesale water provider for the region. As a member agency of the Metropolitan Water District of Southern California (MWD), Central Basin purchases imported water from MWD and wholesales it to the cities and agencies in the region as a supplementary supply. Central Basin also owns and operates a regional recycled water system to the benefit of most of those same cities and agencies. Finally, since 2005, Central Basin owns and operates (in conjunction with the Cities of Pico Rivera, Santa Fe Springs, and Whittier) the Water Quality Protection Project (WQPP) which treats a groundwater contamination plume that continues to migrate from the San Gabriel Main Groundwater Basin. Despite these facts, Central Basin has not been contacted by your office regarding this proposed project or included as an interested party in the proposed remediation projects. Central Basin has attached two items that provides a general description of the project as well as the most recent water quality report results. We have more material available to share with EPA, but due to the voluminous nature of documentation, we will limit the attachments. Interestingly, the current WQPP operations are remarkably similar to what the EPA is currently suggesting as its preferred alternative. With financial assistance from the U.S. Bureau of Reclamation, Central Basin constructed the WQPP for under $10 million with an annual operating budget of just over $1 million. Central Basin would be happy to discuss the WQPP with your office and share our insights in finances and operations.)

Furthermore, on page 3 of the proposed plan document, you state the following, "The use of groundwater in the basin is subject to adjudicated water rights administered by the Water Replenishment District of Southern California (WRD) as acting Watermaster for the Central Basin." This statement is completely inaccurate. In fact,

since 1962, the California Department of Water Resources – Southern Section has been and continues to be the court ordered Watermaster for adjudicated water rights in the Central Groundwater Basin. Additionally, Central Basin is the agency granted with the statutory powers to "acquire, control, distribute, store, spread, sink, treat, purify, recycle, recapture, and salvage any water, including sewage and storm waters, for the beneficial use or uses of the district, its inhabitants, or the owners of rights to water in the district" (Water Code Section 71610), which would include many of the issues implicated in your review of the Omega Chemical Corporation Superfund Site. As opposed to WRD which is a single purpose agency only authorized to collect a replenishment assessment on each acre-foot of water pumped from the Central Groundwater Basin and use it to purchase imported water from Central Basin as a source of replenishment water. Any other function WRD performs is not within their purview and is thus not recognized by the State of California or the Superior Court. Central Basin requests that you modify your documents to reflect this reality in regard to Central Basin and WRD.

**Project Alternatives**

Central Basin is pleased to see that a "no action" alternative is simply not a viable option for the Central Groundwater Basin. Far too many drinking water wells have the capacity to be impacted by this plume; therefore, an action by the EPA is necessary.

Alternatives #2 through #6 include extraction wells to remove contaminated groundwater at a rate of between 1,800 gallons per minute (gpm) up to 2,200 gpm. On an acre-foot (AF) basis, that is between 2,900 and 3,550 AF per year. While this is a laudable goal, we have concerns about several items:

Groundwater Rights

Please recall that the Central Groundwater Basin is an adjudicated basin, with specific groundwater rights to specific rights holders. Thus, the question becomes: whose groundwater rights is the EPA planning to pump in these scenarios? This is not mentioned in the proposed plan document. If the EPA is planning to lease groundwater rights, that should be acceptable, but it should be included in the annual operation and maintenance (O &M) costs and should include a review of the current state and possible future of the lease market in the Central Groundwater Basin. Additionally, is the EPA planning to pay the replenishment assessment (RA) for each AF pumped, or will an exemption from the RA be requested from the Los Angeles Regional Water Quality Control Board? Again, these questions are not discussed in the proposed plan document.

Water Distribution and Regional Partnerships

As mentioned, Central Basin is the wholesale water provider in the region for both potable and recycled water. Alternatives #2, #3 and #6 all include distribution of treated product water to local retailers. We agree that EPA has good expertise regarding extraction and treatment of the contaminated water, but not distribution. That is clearly where Central Basin can assist the EPA with its knowledge and experience within the Central Groundwater Basin. Further, as mentioned above, Central Basin owns and operates the WQPP facilities for distribution to our partner cities potable water supply systems. Central Basin also owns an extensive recycled water network with distribution to many cities and agencies. Alternative #3 includes the potential use of a "nearby reclaimed water line" as a terminal point of disposal of the treated water. Although this option is not the preferred alternative, Central Basin never received notification from the EPA that this alternative was even being discussed or considered. Overall, Central Basin would like to offer its vast experience and knowledge to assist the EPA. We believe our hard work and operations of both potable and recycled water and developing partnerships with cities and agencies to utilize the

product water for regional beneficial purposes gives us a perspective which would be beneficial to EP.

Alternative Feasibility Analysis

Since the EPA has not contacted Central Basin, we have not yet reviewed the feasibility analysis of each of the alternative projects in order to provide comments. Without Central Basin's input, the findings may not be complete. We respectfully request EPA provide those documents to Central Basin for review and not undertake a final decision on any of the 6 Alternatives without our further input.

**Conclusion**

Central Basin is committed to working with the EPA to protect and preserve our regional water supplies, and would like to request a meeting to further discuss our concerns. Thank you for your consideration of these comments.

If you have any questions, please feel free to contact me at (323) 201-5505 or via email at arta@centralbasin.org. You may also contact David Hill at (323) 201-5501 or via email at daveh@centralbasin.org.

Sincerely,

Art Aguilar
General Manager

Enclosure

CC: Central Basin Municipal Water District Board of Directors

# Water Quality Protection Project

Central Basin's long-term commitment to providing customers with excellent drinking water has been proven through the years. Since 1952, the District has continued to provide southeast Los Angeles County with a safe and reliable supplemental supply of high-quality water.

### History of the Project

In the 1980s, a contaminated plume was found in the San Gabriel River Valley, posing a threat to the area's groundwater supply. By 1994, the Environmental Protection Agency declared the water too contaminated to drink. As the plume began to travel toward the Whittier Narrows, it threatened to contaminate the Central Groundwater Basin by infecting the Basin's primary recharge source, the Montebello Forebay. In response to this threat, Central Basin partnered with local cities to pursue the federal funding necessary to construct the Water Quality Protection Project.

## *Benefits* to the Public

Through this project, the District is:

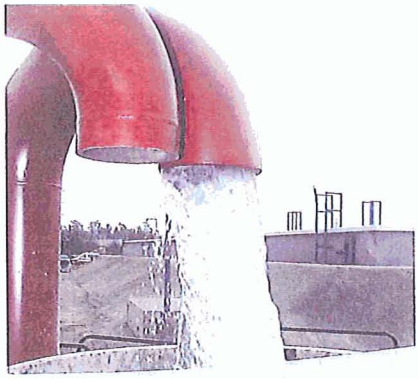
- Preventing the contaminants from further spreading into the area's groundwater storage.
- Preventing the contamination from reaching the spreading grounds, which is used to recharge the groundwater basin.
- Cleaning up the groundwater basin with no cost to the public.
- Providing a safe and reliable drinking water supply to its customers.

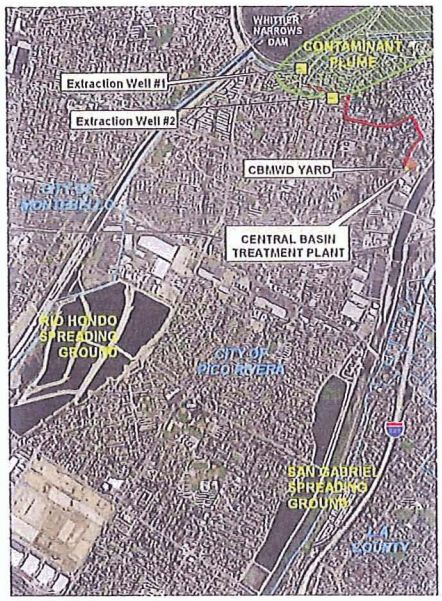
### About the Project

Construction of the $10 million federally-funded project began in 2002. The District built two extraction wells to pump the water to a treatment facility in Pico Rivera where the water could be cleaned and distributed to purveyors. The extraction wells pump the water at a rate of 3,600 gallons per minute to the plant, where it is treated with a granular-activated carbon system.

### Quality: Earning Our Permit

In October 2004, after six months of successfully treating the water, Central Basin earned its domestic drinking water permit from the California Department of Health Services to serve the treated water to the cities of Pico Rivera, Santa Fe Springs and Whittier. Six months of extensive tests have shown that the filters can remove the contaminants from the water, making them non-detectable. The water surpasses the state's drinking water standards, which are the strictest in the country.






### Future Operations

Currently, more than 4,000 acre-feet of water is treated annually by the WQPP. Although the treated water continues to surpass California's stringent water quality standards, the project remains vital to safeguarding the regional groundwater supply. It is for this reason that Central Basin and the cities of Pico Rivera, Whittier and Santa Fe Springs work to pursue the support and federal funding necessary to continue its operations.

Central Basin Municipal Water District
WQPP Treatment Plant Monitoring Report

| Source/Sample Point | Calif. DLR (ppb) | MCL/AL (ppb) | 1/21/10 | 2/16/10 | 3/16/10 | 4/20/10 | 5/18/10 | 6/15/10 | 7/20/10 | 8/17/10 | 9/21/10 | 10/19/10 | Nov | Dec |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| *Well CB-1 (1910253-001)* | | | | | | | | | | | | | | |
| Total Coliform (monthly) | P/A | - | A | A | A | A | A | A | A | A | A | A | | |
| Fecal Coliform (monthly) | P/A | - | A | A | A | A | A | A | A | A | A | A | | |
| HPC (monthly) | MPN/100 mL | - | ND | 4 | 2 | ND | 2 | ND | 2 | ND | ND | 2 | | |
| TCE (monthly) | 0.5 | 5 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | | |
| PCE (monthly) | 0.5 | 5 | ND | 0.58 | 0.74 | 0.83 | ND | ND | ND | ND | ND | 1.2 | | |
| NDMA (quarterly) | 0.002 | 0.010 | | | 0.0031 | | | 0.0023 | | | ND | | | |
| 1,4-Dioxane (annually; quarterly if detected) | 3 | 3 | | | | | | ND | | | | | | |
| Perchlorate (annually; quarterly if detected) | 1.0 | 4 | | | | | | ND | | | | | | |
| Nitrate as NO3 | 2 | 45 | | | | | | 7.3 | | | | | | |
| *Well CB-2 (1910253-002)* | | | | | | | | | | | | | | |
| Total Coliform (monthly) | P/A | - | A | A | A | A | A | A | A | A | A | A | | |
| Fecal Coliform (monthly) | P/A | - | A | A | A | A | A | A | A | A | A | A | | |
| HPC (monthly) | MPN/100 mL | - | 21 | 2 | 4 | ND | ND | ND | ND | 2 | ND | ND | | |
| TCE (monthly) | 0.5 | 5 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | | |
| PCE (monthly) | 0.5 | 5 | ND | ND | 0.62 | ND | ND | ND | ND | ND | 0.52 | 0.51 | | |
| NDMA (quarterly for 1 yr) | 0.002 | 0.010 | | | 0.0027 | | | 0.002 | | | ND | | | |
| 1,4-Dioxane (annually; quarterly if detected) | 3 | 3 | | | | | | ND | | | | | | |
| Perchlorate (annually; quarterly if detected) | 1.0 | 4 | | | | | | ND | | | | | | |
| Nitrate as NO3 | 2 | 45 | | | | | | 14 | | | | | | |
| Lead Vessels | | | | | | | | | | | | | | |
| A1 | | | | | | | | | | | | | | |
| *50% Port (1910253-003)* | | | | | | | | | | | | | | |
| VOCs (monthly) | 0.5 | 5 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | | |
| *75% Port (1910253-004)* | | | | | | | | | | | | | | |
| Effluent (1910253-005) | | | | | | | | | | | | | | |
| B1 | | | | | | | | | | | | | | |
| *50% Port (1910253-009)* | | | | | | | | | | | | | | |
| VOCs (monthly) | 0.5 | 5 | | | | | | | | | | | | |
| *75% Port (1910253-010)* | | | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | | |
| Effluent (1910253-011) | | | | | | | | | | | | | | |
| C1 | | | | | | | | | | | | | | |
| *50% Port (1910253-015)* | | | | | | | | | | | | | | |
| VOCs (monthly) | 0.5 | 5 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | | |
| *75% Port (1910253-016)* | | | | | | | | | | | | | | |
| Effluent (1910253-017) | | | | | | | | | | | | | | |
| D1 | | | | | | | | | | | | | | |
| *50% Port (1910253-021)* | | | | | | | | | | | | | | |
| VOCs (monthly) | 0.5 | 5 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | | |
| *75% Port (1910253-022)* | | | | | | | | | | | | | | |

Central Basin Municipal Water District
WQPP Treatment Plant Monitoring Report

| Source/Sample Point | Calif. DLR (ppb) | MCL/AL (ppb) | 1/21/10 | 2/16/10 | 3/16/10 | 4/20/10 | 5/18/10 | 6/15/10 | 7/20/10 | 8/17/10 | 9/21/10 | 10/19/10 | Nov | Dec |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Effluent (1910253-023) | | | | | | | | | | | | | | |
| E1 | | | | | | | | | | | | | | |
| *50% Port (1910253-027)* | | | | | | | | | | | | | | |
| VOCs (monthly) | 0.5 | 5 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | | |
| *75% Port (1910253-028)* | | | | | | | | | | | | | | |
| Effluent (1910253-029) | | | | | | | | | | | | | | |
| **Lag Vessels** | | | | | | | | | | | | | | |
| A2 | | | | | | | | | | | | | | |
| *Effluent (1910253-008)* | | | | | | | | | | | | | | |
| VOCs | 0.5 | 5 | | | | | | | | | | | | |
| B2 | | | | | | | | | | | | | | |
| *Effluent (1910253-014)* | | | | | | | | | | | | | | |
| VOCs | 0.5 | 5 | | | | | | | | | | | | |
| C2 | | | | | | | | | | | | | | |
| *Effluent (1910253-020)* | | | | | | | | | | | | | | |
| VOCs | 0.5 | 5 | | | | | | | | | | | | |
| D2 | | | | | | | | | | | | | | |
| *Effluent (1910253-026)* | | | | | | | | | | | | | | |
| VOCs | 0.5 | 5 | | | | | | | | | | | | |
| E2 | | | | | | | | | | | | | | |
| *Effluent (1910253-032)* | | | | | | | | | | | | | | |
| VOCs | 0.5 | 5 | | | | | | | | | | | | |
| ***Plant Effluent (1910253-033)*** | | | | | | | | | | | | | | |
| Total Coliform (monthly) | P/A | - | A | A | A | A | A | A | A | A | A | A | | |
| Fecal Coliform (monthly) | P/A | - | A | A | A | A | A | A | A | A | A | A | | |
| HPCs (monthly) | MPN/100 mL | - | ND | ND | 2 | ND | ND | ND | ND | ND | ND | ND | | |
| VOCs (monthly) | 0.5 | 5 | ND | ND | ND | ND | ND | ND | ND | ND | ND | ND | | |
| NDMA (quarterly) | 0.002 | 0.010 | | | 0.0025 | | | ND | | | ND | | | |
| 1,4-Dioxane | 3 | 3 | | | | | | ND | | | | | | |
| Perchlorate | 1.0 | 4 | | | | | | ND | | | | | | |